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Attorneys for Counterdefendants SANDEEP SOOD and
 MONSOON ENTERPRISES, INC. a California corporation

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

NEXTDOOR.COM, INC., a Delaware
 corporation,

Plaintiff,

v.

RAJ ABHYANKER, an individual,

Defendant.

Case No.: 3:12-cv-05667-EMC

**COUNTERDEFENDANTS SANDEEP SOOD
 AND MONSOON ENTERPRISES, INC.'S
 NOTICE OF MOTION AND MOTION TO
 DISMISS COUNTERCLAIMS**

RAJ ABHYANKER, an individual,

Counterclaimant,

v.

NEXTDOOR.COM, INC., a Delaware
 corporation; PRAKASH JANAKIRAMAN, an
 individual; BENCHMARK CAPITAL
 PARTNERS VII, L.P., a Delaware limited
 partnership; BENCHMARK CAPITAL
 MANAGEMENT CO. VII LLC, a Delaware
 limited liability company; SANDEEP SOOD, an
 individual; MONSOON COMPANY, an
 unknown business entity, and DOES 1-50,
 inclusive,

Counterdefendants.

Complaint Filed: November 5, 2012
 Countercomplaint Filed: January 10, 2013

Date: May 2, 2013
 Time: 1:30 PM
 Judge: Honorable Edward M. Chen

{00012851;1}

COUNTERDEFENDANTS SANDEEP SOOD AND MONSOON ENTERPRISES, INC.'S NOTICE OF MOTION AND MOTION TO
 DISMISS COUNTERCLAIMS

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on May 2, 2013 at 1:30 PM, or as soon thereafter as the matter may be heard, in the courtroom of the Honorable Edward M. Chen, 450 Golden Gate Avenue, San Francisco, California 94102, Counterdefendants SANDEEP SOOD ("Sood") and MONSOON ENTERPRISES, INC. (erroneously sued herein as Monsoon Company, an unknown business entity) ("Monsoon") will and hereby do move for an order to dismiss Defendant and Counterclaimant Raj Abhyanker's counterclaims and to strike affirmative defenses pursuant to Federal Rules of Civil Procedure 12(b)(6) and 8(a).

This Motion is based upon this Notice of Motion and Motion, the Memorandum of Points and Authorities, the Request for Judicial Notice, the accompanying Declaration of Harpreet S. Walia in support thereof, the pleadings and other papers on file in this action, and any other oral or written submissions as the Court may entertain.

STATEMENT OF THE ISSUES

1. Has Counterclaimant Raj Abhyanker failed to state a claim for Trade Secret Misappropriation against Sood and Monsoon upon which relief can be granted, such that the Counterclaim against Sood and Monsoon should be dismissed?

2. Has Counterclaimant Raj Abhyanker failed to state a claim for Breach of Written Contract against Sood and Monsoon upon which relief can be granted, such that the Counterclaim against Sood and Monsoon should be dismissed?

Dated: March 15, 2013

ROYSE LAW FIRM, PC

By: 

Harpreet S. Walia, Attorneys for Counterdefendants
SANDEEP SOOD and MONSOON ENTERPRISES,
INC. (erroneously sued as MONSOON COMPANY)